

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND DIVISION

DONALD H. RILEY JR. DBA  
FASHION CLEANERS,

Plaintiff,

V.

SHELLI HULA-PALMER & SECURITY  
NATIONAL INSURANCE COMPANY,

Defendants.

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CIVIL ACTION NO. 7:17-CV-197

## **DEFENDANT’S NOTICE OF REMOVAL**

Defendant Security National Insurance Company (“Security”) files this Notice of Removal under 28 U.S.C. §§ 1332, 1441, and 1446 and states as follows:

# I. INTRODUCTION

1. Plaintiff Donald H. Riley Jr. d/b/a Fashion Cleaners (“Fashion” or “Plaintiff”) commenced this lawsuit on August 31, 2017 by filing Plaintiff’s Original Petition (“Petition”) in the 161<sup>st</sup> Judicial District Court of Ector County, Texas – Cause No. B-17-09-1046-CV.

2. Plaintiff's Petition, which includes a jury demand, names Security National Insurance Company and Shelli Hula-Palmer ("Hula-Palmer") as defendants (collectively, "Defendants"). Hula-Palmer was an adjuster assigned to Plaintiff's insurance claim which made the basis of this lawsuit.

3. Plaintiff's Petition asserts the following claims against Security: breach of contract and violations of the Chapter 542 of the Texas Insurance Code. Plaintiff's petition asserts that both